

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

09/07/2022

Submitted Date:

09/08/2022

Document Number:

696204050

## FIELD INSPECTION FORM

 Loc ID: 481742  
 Inspector Name: Trujillo, Aaron  
 On-Site Inspection:   
 2A Doc Num:
**Status Summary:**

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

**Operator Information:**
 OGCC Operator Number: 10433  
 Name of Operator: LARAMIE ENERGY LLC  
 Address: 1700 LINCOLN ST STE 3950  
 City: DENVER State: CO Zip: 80203
**Findings:**

- 15 Number of Comments
- 3 Number of Corrective Actions
- Corrective Action Response Requested

**ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE**

**Contact Information:**

Contact Name	Phone	Email	Comment
, Laramie		cogccnotifications@laramie-energy.com	All Inspections

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479533	CENTRALIZED EP WASTE MGMT FAC		03/03/2021		-	Annex Cuttings Facility 479533	CI

**General Comment:**

On 9/7/2022, Reclamation Specialist Trujillo conducted a stormwater and construction inspection at Laramie Energy's Annex Cuttings Facility 479533 location in Garfield County, Colorado.

This inspection is in response to Form 42 (#403152870) "Notice of Construction" stating construction commenced 9/5/2022; it was observed that soil salvage operations were in process at time of inspection.

The following compliance issues were observed during this inspection:

- Stormwater
- Oil and Gas Location Signage not posted at Location entrance
- Location assessment not posted at Location

Refer to the "Construction", "Location" and "Reclamation" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

**Location**

Overall Good:

**Signs/Marker:**

Type	OTHER		
Comment:	It was observed in this inspection that signage for the Annex Cuttings Facility Location was not posted at the Location entrance.		
Corrective Action:	Comply with 605.a. A CA date of 9/5/2022 is being provided, as signage was required to be posted at the location entrance at time of construction.	Date:	09/05/2022

**Emergency Contact Number:**

Comment:

Corrective Action:

Date: \_\_\_\_\_

Overall Good:

**Spills:**

Type	Area	Volume			

In Containment: No

Comment:

Multiple Spills and Releases?

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Location Construction**

Location ID: 481742 CDP: \_\_\_\_\_

Comment:  It was observed in this inspection that a copy of the approved Form 2A, and any Form 4 modifying the approved Form 2A, was not posted on Location.

Corrective Action:  Comply with 406.c. A CA date of 9/5/2022 is being provided as the Location Assessment was required to be posted upon commencement of operations.

Date: 09/05/2022

**Form 2A COAs:**

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Wildlife BMPs:**

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
--------------	---------	------------	---------

WADDLES	Yes		
Comments: Erosion BMPs: <span style="color:red;">Erosion logs were observed along the perimeter of the Location. BMPs appear to be in proper functioning condition at time of inspection.</span>			
Other BMPs: <input style="width:100%;" type="text"/>			
Corrective Action:			Date:
RETENTION PONDS	No		
Comments: Erosion BMPs: <span style="color:red;">"Stormwater Management Plan" #402859117 identifies that a sediment trap/pond will be constructed on the NE end of the Location; soil salvage Operations "in process" at time of inspection- BMP not yet installed. Ensure control is constructed in accordance with good engineering practices.</span>			
Other BMPs: <input style="width:100%;" type="text"/>			
Corrective Action:			Date:
SILT FENCES	No		
Comments: Erosion BMPs: <span style="color:red;">"Stormwater Management Plan" #402859117 identifies silt fence to be used along perimeter of the Location to manage runoff; silt fence not observed at time of inspection. Operator appears to be utilizing erosion logs in lieu of fence.</span>			
Other BMPs: <input style="width:100%;" type="text"/>			
Corrective Action:			Date:
	No		
Comments: Erosion BMPs: <span style="color:red;">"Stormwater Management Plan" #402859117 identifies that a sediment trap w/ 6-inch outlet pipe will be constructed along the eastern end of the cuttings treatment management area; soil salvage Operations "in process" at time of inspection- BMP not yet installed. Ensure control is constructed in accordance with good engineering practices.</span>			
Other BMPs: <input style="width:100%;" type="text"/>			
Corrective Action:			Date:
	No	Vehicle Tracking	No
Comments: Erosion BMPs: <span style="color:red;">It was observed in this inspection that BMPs to mitigate fugitive dust, or minimize tracking and sediment transport was missing or insufficient; offsite sediment transport from road evident; soils along access road loose/powdery and at risk to wind erosion; application of freshwater to dried soils not observed; water truck not observed on site or within immediate areas.</span>			
Other BMPs: <input style="width:100%;" type="text"/>			
Corrective Action: <span style="color:red;">Comply with Rule 1002.f.(2) and implement BMPs to minimize erosion, degradation and sediment transport from operational roads, well pads, and other unpaved surfaces. Comply with Form 2A #402585327 COA #10, as well as Form 4 #403070576 Rule 1002.f conditions.</span>			Date: 09/12/2022 2
DITCHES	No		
Comments: Erosion BMPs: <span style="color:red;">"Stormwater Management Plan" #402859117 identifies that a ditch/berm will be constructed along the eastern perimeter of the Location to divert stormwater to a sediment trap; soil salvage Operations "in process" at time of inspection- BMP not yet installed. Ensure control is constructed in accordance with good engineering practices.</span>			
Other BMPs: <input style="width:100%;" type="text"/>			
Corrective Action:			Date:

BERMS	No	
-------	----	--

Comments: Erosion BMPs: "Stormwater Management Plan" #402859117 identifies that a ditch/berm will be constructed along the eastern perimeter of the Location to divert stormwater to a sediment trap; soil salvage Operations "in process" at time of inspection- BMP not yet installed. Ensure control is constructed in accordance with good engineering practices.

Other BMPs: \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

**Comment:** "Stormwater Management Plan" #402859117 suggests Operator will "construct ditch/berm w/ (with) topsoil". Pursuant to Form 4 #403070576 Conditions of Approval, ensure topsoil material is not utilized in the installation of any stormwater control measures (e.g. use during construction of a ditch and berm, sediment trap); the use of topsoil material as part of stormwater controls do not comport with Rule 1002.c. See "COGCC Comment" for addition topsoil comment.

**Corrective Action:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**On Site Inspection (305):**

Surface Owner Contact Information:

Name: \_\_\_\_\_ Address: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_ Cell Phone: \_\_\_\_\_

Operator Rep. Contact Information:

Landman Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_  
 Date Onsite Request Received: \_\_\_\_\_ Date of Rule 306 Consultation: \_\_\_\_\_

Request LGD Attendance: \_\_\_\_\_

LGD Contact Information:

Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_ Agreed to Attend: \_\_\_\_\_

Summary of Landowner Issues:

\_\_\_\_\_

Summary of Operator Response to Landowner Issues:

\_\_\_\_\_

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

\_\_\_\_\_

**Inspected Facilities**

Facility ID: 479533 Type: CENTRALIZE API Number: - Status:          Insp. Status: CI

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: RANGELAND

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_ In \_\_\_\_\_

Comment [Soil salvage operations were "in process" at time of inspection; Operator estimates approximately 5,050 cy of topsoil will be salvaged. Ensure all topsoil is salvaged, stored and protected in accordance with Rule 1002.b.\(2\) and 1002.c.](#)

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_ In Process \_\_\_\_\_

Comment [Soil salvage operations were "in process" at time of inspection; Ensure all topsoil is salvaged, stored and protected in accordance with Rule 1002.b.\(2\) and 1002.c.](#)

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Pit, cellars, rat holes and other bores closed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Guy line anchors marked? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003b. Area no longer in use? \_\_\_\_\_ Production areas stabilized ? \_\_\_\_\_  
 1003c. Compacted areas have been cross ripped? \_\_\_\_\_  
 1003d. Drilling pit closed? \_\_\_\_\_ Subsidence over on drill pit? \_\_\_\_\_  
 Cuttings management: \_\_\_\_\_  
 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? \_\_\_\_\_  
 Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

RESTORATION AND REVEGETATION

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

1003e. INTERIM VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

1003 f. Weeds Noxious weeds? \_\_\_\_\_

Comment

Corrective Action

Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND \_\_\_\_\_

Reminder: \_\_\_\_\_

Comment:

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded \_\_\_\_\_ Contoured \_\_\_\_\_ Culverts removed \_\_\_\_\_

Gravel removed \_\_\_\_\_

Location and associated production facilities reclaimed \_\_\_\_\_ Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_ Cropland: perennial forage \_\_\_\_\_

Weeds present \_\_\_\_\_ Subsidence \_\_\_\_\_

1004.d. FINAL VEGETATION TRANSECT  
 TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_  
 TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_  
 TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_  
 VEGETATIVE COVER \_\_\_\_\_

Comment:

Corrective Action:

Date \_\_\_\_\_

Overall Final Reclamation \_\_\_\_\_ Well Release on Active Location  Multi-Well Location

**COGCC Comments**

Comment	User	Date
<p><b>TOPSOIL COMMENT</b></p> <p>If topsoil is to be left as a berm along the eastern perimeter of the Annex Location, Operator shall ensure BMPs are implemented so that topsoils remain properly segregated, and do not function as part of stormwater controls on the Location; BMPs to stabilize, and protect the topsoil stockpiles from wind and water erosion, as well as to protect from commingling with subsoils from the fill slope, and sediment transported/deposited from stormwater runoff will be required.</p>	trujilloam	09/08/2022

**Attached Documents**

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
403159622	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5851267">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5851267</a>
696204051	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5851262">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5851262</a>